

EXHIBIT 15

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

5 WAYMO, LLC,)
6 Plaintiffs,)
7 - vs -) Case No.
8 UBER TECHNOLOGIES, INC.,) 3:17-cv-00939
9 OTTOMOTTO LLC; OTTO)
10 TRUCKING, LLC,)
11 Defendants.)

15 VIDEOTAPED DEPOSITION OF JOHN BARES,
16 a witness, called by the Plaintiff for examination,
17 in accordance with the Federal Rules of Civil
18 Procedure, taken by and before Tammie Elias, RPR and
19 Notary Public in and for the Commonwealth of
20 Pennsylvania, at the office of Reed Smith, 225 Fifth
21 Avenue, Suite 1200, Pittsburgh, Pennsylvania, on
22 Friday, June 16, 2017, commencing at 9:05 a.m.

24 JOB No. 2640097
25 PAGES 1 - 317

1 APPEARANCES :

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24 ALSO PRESENT:

25 Matthew Rethage, Videographer

1	- - - -	09:05a
2	PROCEEDINGS	09:05a
3	- - - -	09:05a
4	THE VIDEOGRAPHER: Good morning. My	09:05a
5	name is Matthew Rethage of AKF VideoTech	09:05a
6	Services representing Veritext. The time that	09:05a
7	is indicated on the screen is 9:05 a.m. on	09:05a
8	June the 16th, 2017. Will the parties that	09:05a
9	are present today please state their names and	09:05a
10	whom they represent for the record.	09:05a
11	MR. JUDAH: James Judah, Waymo.	09:05a
12	MR. BRILLE: Mike Brille, Boies	09:05a
13	Schiller Flexner for Uber and the witness.	09:05a
14	MR. NORRIS: Cain Norris, Boies	09:05a
15	Schiller Flexner for Uber and the witness.	09:05a
16	MR. BERGSTROM: Aaron Bergstrom with	09:05a
17	Uber.	09:05a
18	MS. YANG: Michelle Yang, Morrison	09:05a
19	Foerster for Uber.	09:05a
20	THE VIDEOGRAPHER: Thank you. If	09:05a
21	there's nothing further, will the Court	09:05a
22	Reporter please swear in the witness.	09:05a
23	- - - -	09:06a
24	JOHN BARES,	09:06a
25	having been duly sworn,	09:06a

1	was examined and testified as follows:	09:06a
2	- - - -	09:06a
3	EXAMINATION	09:06a
4	- - - -	09:06a
5	BY MR. JUDAH:	09:06a
6	Q. Good morning, Mr. Bares.	09:06a
7	A. Good morning.	09:06a
8	Q. Have you ever been deposed before?	09:06a
9	A. I have not.	09:06a
10	Q. I'm going to go over some ground rules?	09:06a
11	A. Okay.	09:06a
12	Q. The first, you're aware that you're under oath	09:06a
13	today?	09:06a
14	A. Yes.	09:06a
15	Q. And that oath is the same you would take in a	09:06a
16	courtroom if you're testifying before a judge	09:06a
17	and a jury?	09:06a
18	A. Yes.	09:06a
19	Q. It's important to speak slowly and clearly,	09:06a
20	that way the Court Reporter is taking down	09:06a
21	everything we say. For that reason, only one	09:06a
22	of us should speak at the time so the Court	09:06a
23	Reporter can make an accurate record. Do you	09:06a
24	understand that?	09:06a
25	A. Yes, I do.	09:06a

1	Uber, what was his title?	09:21a
2	A. I don't know.	09:21a
3	Q. When did Mr. Levandowski start working for	09:21a
4	Uber?	09:21a
5	A. Can you clarify in what capacity?	09:21a
6	Q. Well, let's start with the earliest date	09:21a
7	Mr. Levandowski started working for Uber in	09:21a
8	any capacity?	09:22a
9	A. So to my knowledge it would have been early	09:22a
10	May, late April to early May 2016, when he was	09:22a
11	consulting for the company.	09:22a
12	Q. And how long was Mr. Levandowski consulting	09:22a
13	for the company?	09:22a
14	A. I believe from that period up through August	09:22a
15	18th plus or minus a few days when Uber	09:22a
16	acquired his company and therefore he became	09:22a
17	an employee.	09:22a
18	Q. What was Mr. Levandowski's title when he	09:22a
19	became an Uber employee?	09:22a
20	A. I don't know.	09:22a
21	Q. Have you ever heard of Mr. Levandowski	09:22a
22	referred to as Uber's vice president of	09:22a
23	engineering?	09:22a
24	A. Yes.	09:22a
25	Q. Was that his title at some point?	09:22a

1 I declare under penalty of perjury
2 under the laws that the foregoing is
3 true and correct.

4

5 Executed on _____, 20____,
6 at _____, _____.

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10 _____

11 JOHN BARES

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1 COMMONWEALTH OF PENNSYLVANIA)

CERTIFICATE

2 COUNTY OF INDIANA)

SS:

3 I, Tammie Elias, RPR and Notary Public in and
4 for the Commonwealth of Pennsylvania, do hereby
5 certify that the witness, JOHN BARES, was by me
6 first duly sworn to testify to the truth; that the
7 foregoing deposition was taken at the time and place
8 stated herein; and that the said deposition was
9 recorded stenographically by me and then reduced to
10 printing under my direction, and constitutes a true
11 record of the testimony given by said witness.

12 I further certify that the inspection, reading
13 and signing of said deposition were NOT waived by
14 counsel for the respective parties and by the
15 witness.

16 I further certify that I am not a relative or
17 employee of any of the parties, or a relative or
18 employee of either counsel, and that I am in no way
19 interested directly or indirectly in this action.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand and affixed my seal of office this 19th day of
22 June, 2017.

24 <%signature%>

25 _____
Notary Public